35-08/MEU FREEHILL HOGAN & MAHAR, LLP Attorneys for Defendant AYRES SHIPPING INC. 80 Pine Street New York, NY 10005 Telephone: (212) 425-1900

Facsimile: (212) 425-1901 Michael E. Unger (MU 0045)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PAKRI TANKERS OU,

08 CV 2424 (GBD)

NOTICE OF MOTION

-against-

AYRES SHIPPING INC.,

Defendant.

Plaintiffs,

PLEASE TAKE NOTICE that Defendant AYRES SHIPPING INC. ("AYRES"), by its attorneys Freehill Hogan & Mahar, LLP, upon the Affirmation of Michael E. Unger dated April 10, 2008, the Memorandum of Law submitted herewith, and the pleadings and proceedings heretofore had herein, will move this Court, pursuant to Rule E, at a hearing at the Courthouse located at 500 Pearl Street, New York, New York, before the Honorable George B. Daniels at 10:00 a.m. on April 25, 2008, or as soon thereafter as counsel may be heard, for counter-security on Defendant's claims or in the alternative, for vacture of Plaintiff's attachment and dismissal of this case.

Dated: New York, New York April 10, 2008

FREEHILL HOGAN & MAHAR, LLP

Attorneys for Defendant AYRES SHIPPING INC.

By:

Michael E. Unger (MV 0045)

Lawrence J. Kahn (LK 5215

80 Pine Street

New York, NY 10005

(212) 425-1900

(212) 425-1901 fax

TO:

MAHONEY & KEANE, LLP Attorney for Plaintiff PAKRI TANKERS OU 111 Broadway, 10th Floor New York, NY 10006 Attn: Christopher H. Mansuy, Esq. (212) 385-1422